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June 9, 2025

Via ECF

Magistrate Judge Hon. Miroslav Lovric
United States District Court
Northern District of New York
Federal Building and U.S. Courthouse
15 Henry Street
Binghamton, NY 13901

Re: *Fanelli v. Ellenville Central School District*
Case No.: 24-cv-826 (MAD/ML)

Dear Magistrate Lovric:

Please be advised that since the original mediation date of May 16, 2025, the parties have engaged in two subsequent mediations, held on June 4, 2025 and June 5, 2025. As of this date, the parties have come to a tentative settlement structure and are working through the various particulars to be included in the settlement agreement. The parties have requested that I remain involved as the mediator to assist in bringing this matter to conclusion. As such, and based on the schedules of the parties, we do not anticipate having that portion completed prior to June 25, 2025. However, it is the hope and intention of all parties that a complete settlement agreement will be finalized by June 25, 2025 and delivered to the Plaintiff for his 21-day consideration pursuant to the Older Workers Benefits Protections Act.

Thank you in advance for your consideration in this matter. If the Court needs any additional information from me as the mediator, please do not hesitate to contact me.

Respectfully,
HINMAN STRAUB P.C.

By: Elena DeFio Kean
Elena DeFio Kean, Esq.
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EDK/mck

cc: All Parties of Record (*Via ECF*)
4924-8368-8779, v. 1